

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**BESSEMER SYSTEM FEDERAL CREDIT
UNION, on behalf of itself and its members,**

Plaintiff,

vs.

Case No. 2:19-cv-00624-MJH

**FISERV SOLUTIONS, LLC, f/k/a FISERV
SOLUTIONS, INC., and FISERV, INC.,**

Defendants.

**JOINT MOTION TO MODIFY SCHEDULE TO FILE OBJECTIONS
AND RESPONSES TO SPECIAL MASTER’S REPORT & RECOMMENDATION**

Plaintiff Bessemer System Federal Credit Union (“Bessemer”) and Defendants Fiserv Solutions, LLC, f/k/a Fiserv Solutions, Inc., and Fiserv, Inc. (together, “Defendants”) hereby jointly move for an Order modifying the schedule to file objections and responses to Special Master’s Report and Recommendation dated June 13, 2023 and to expand the page limit for these submissions. In support of this Motion, the parties state as follows:

1. On June 13, 2023, Special Master Mark D. Shepard filed a Report and Recommendation regarding the scope of discovery and nine (9) discovery motions. (ECF. No. 209).
2. After conferring in good faith regarding the efficient management of this dispute, and for reasons of judicial efficiency and other good cause, the Parties hereby respectfully request that the Court enter an Order extending the objection and response deadline and page limits established in the Court’s Order Appointing Special Discovery Master, and set the following schedule and page limits instead:

- a. The Parties shall file their objections on or before June 30, 2023;
- b. The Parties shall file their response to objections filed by the opposing Party by July 17, 2023; and
- c. The page limit for the Parties' objections and responses shall be extended to 20 pages.

WHEREFORE, the Parties respectfully request that the Court enter an Order consistent with this Motion.

Dated: June 21, 2023

Respectfully submitted,

s/ Benjamin Wilkinson

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